

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

iROBOT CORPORATION,

Plaintiff,

v.

SHARKNINJA OPERATING LLC,  
SHARKNINJA MANAGEMENT LLC,  
AND SHARKNINJA SALES COMPANY,

Defendants.

C.A. No. 1:19-cv-12125-ADB

**REQUEST FOR ORAL ARGUMENT  
PURSUANT TO LR 7.1**

**SHARKNINJA’S MOTION TO  
DISMISS, STAY, OR TRANSFER**

Defendants SharkNinja Operating LLC, SharkNinja Management LLC, and SharkNinja Sales Company, (collectively, “SharkNinja”) hereby move, pursuant to the “first-to-file” rule and 28 U.S.C. § 1404(a), for this Court to dismiss, stay, or transfer this case to the U.S. District Court for the District of Delaware, where another action addressing substantively the same legal and factual questions is already pending.

For the reasons set forth in SharkNinja’s Memorandum of Law filed with this Motion, SharkNinja respectfully requests that this Court grant its Motion and award any further relief that the Court may deem just.

**REQUEST FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1(d), Defendant hereby requests an oral argument on its Motion to Dismiss, Stay, or Transfer.

Dated: October 18, 2019

Respectfully Submitted,

/s/ Alissa K. Lipton

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**LOCAL RULE 7.1 CERTIFICATION**

Pursuant to Local Rule 7.1, the undersigned hereby certifies that counsel for SharkNinja have in good faith conferred with counsel for iRobot Corporation to resolve or narrow the issues presented in this motion. SharkNinja and iRobot held a meet and confer via teleconference on October 18, 2019, regarding the issues presented in this motion. During the call, Brian Rosenthal was present for SharkNinja, and Gregg LoCascio was present for iRobot. The parties were unable to reach agreement on the issues presented in this motion. SharkNinja counsel followed up with iRobot counsel via email on October 18, 2019 to confirm the outcome of the meet and confer.

/s/ Alissa K. Lipton

Alissa K. Lipton BBO #678314

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was filed through the ECF system on the October 18, 2019 and will be sent electronically to the registered participants identified on the Notice of Electronic Filing.

/s/ Alissa K. Lipton

Alissa K. Lipton BBO #678314